

**HEARING DATE AND TIME:
MARCH 12, 2019 AT 10:00 A.M.**

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

**OBJECTION DEADLINE DATE AND TIME:
MARCH 8, 2019 AT 4:00 P.M.**

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In re:	:	Chapter 7
	:	
AMPAL-AMERICAN ISRAEL	:	Case No. 12-13689 (SMB)
CORPORATION,	:	
	:	
Debtor.	:	
-----	x	
ALEX SPIZZ, as Chapter 7 Trustee for Ampal-	:	Adv. No. 14-02110 (SMB)
American Israel Corporation,	:	
	:	RELATED DOC. NO. 57
Plaintiff,	:	
	:	
v.	:	
	:	
IRIT ELUZ, THE ESTATE OF YEHUDA	:	
KARNI, MENAHEM MORAG, DANIEL	:	
VAKNIN and REVITAL DEGANI,	:	
	:	
Defendants.	:	
-----	x	

**PLAINTIFF'S NOTICE OF MOTION TO
EXTEND DISCOVERY DEADLINES AND COMPEL DISCOVERY**

PLEASE TAKE NOTICE that upon the accompanying *Memorandum of Law in Support of Plaintiff's Motion to Extend Discovery Deadlines and Compel Discovery*, the plaintiff Alex Spizz, as Chapter 7 Trustee for Ampal-American Israel Corporation (the "Plaintiff"), by and through its undersigned counsel, will move this Court, before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, located at One Bowling Green, New York, New York 10004, on **March 12, 2019 at 10:00 a.m.**, or as soon thereafter as counsel may be heard, for an order (i) extending the current discovery deadlines for not less than ninety (90) days, (ii) compelling Defendant Irit Eluz ("Eluz") to produce additional documents in response to

Plaintiff's First Request for Production of Documents; and (iii) awarding Plaintiff reasonable attorneys' fees, costs and expenses incurred in connection with this motion.

PLEASE TAKE FURTHER NOTICE the Hearing may be continued or adjourned from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing or at a later hearing.

PLEASE TAKE FURTHER NOTICE that any opposing affidavits, answering memoranda of law, or other responses shall be filed and served no later than **March 8, 2019 at 4:00 p.m. (EST)**, must be made in writing, state with particularity the grounds therefore, shall conform to the United States Bankruptcy Rules and the Local Rules of the Bankruptcy Court, include in the upper right hand corner of the caption, the ECF docket number to which the filing relates, and shall be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (with a courtesy copy delivered directly to the Chambers of Stuart M. Bernstein, United States Bankruptcy Judge, United States Bankruptcy Court, The Alexander Hamilton Custom House, One Bowling Green, Room 723, New York, NY 10004), and served upon Akerman LLP, Attorney for the Plaintiff, 666 Fifth Avenue, 20th Floor, New York, New York, 10103 (Attention: John P. Campo, Esq.) together with proof of service thereof.

PLEASE TAKE FURTHER NOTICE that unless responses are received by that time, the relief may be granted as requested.

Dated: New York, New York
February 28, 2019

AKERMAN LLP

By: /s/John P. Campo
John P. Campo
Darryl R. Graham
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*Counsel to Plaintiff Alex Spizz, Trustee for
Ampal-American Israel Corporation*